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UNITED STATES ENVIRONMENTAL PROTECTION
AGENCY

REGION 8
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Mr. Joseph A. Legare
Assistant Manager for Environment and Stewardship
U.S. Department of Energy
Rocky Flats Field Office
10808 Highway 93, Unit A
Golden, Colorado 80403-8200

JUN 10 2004

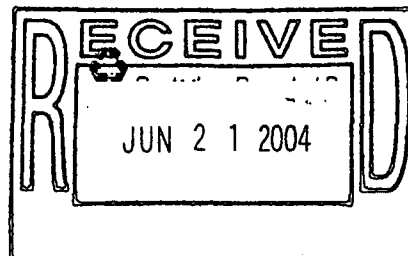
Dear Mr. Legare:

RE: Interim Measure/Interim Remedial Action, IHSS Group 900-1 1,
(903 Lip Area and Vicinity, The Windblown Area,
and Surface Soil in Operable Unit 1)

General Comments

The alternative selected through this process is not the most protective of surface water of those considered. Nevertheless, protection of surface water in the long term is one of the remedial action objectives listed in the document in section 3.2. Although it is true that the surface water standards have always been met at the Woman Creek point of compliance, GS01, the flow-weighted sample collected in early February 2004 was the highest individual value for plutonium from this location and resulted in the 30-day average for reaching the standard of 0.15 pCi/l for the period February 12-16, 2004. Subsequent samples have not been elevated, and there has been no good explanation of what might have caused this one sample to exceed the previous maximum by an order of magnitude, leaving some uncertainty as to the cause of this sampling result. Of course this recent sample information was not available at the time that this document was drafted and therefore did not play a part in the decision to recommend Alternative 2 over Alternative 3.

This document compares two very similar alternatives, with the only difference between them that #3 also includes an eastern extension to the South Interceptor Ditch which would provide diversion of surface water runoff from a 17 acre area into Pond C2. Without the diversion channel, runoff from this area known as Hillside 44, will continue to flow into Woman Creek and eventually to GS01. Adding the channel will only increase the overall project cost by about 1.7%, but it would result in diversion of up to 25% of the plutonium



ADMIN RECORD

BZ-A-000713

5400

1/2

concentration measured at station GS01. In view of this and recent sample results at GS01, EPA recommends that Alternative 3 be selected as the most appropriate remedial action.

Specific Comments

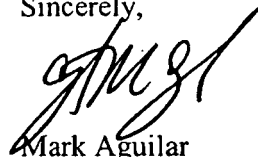
Appendix G, Section IV B, Dynamic Field Characterization and Data Updates

The last paragraph in the section states that as excavation progresses in the field, additional soil samples will become available and that these will be added to the database for use in updating the kriged model. It is also stated that, as a result, use of new data could change the final excavation imprint from what is shown in this report.

There are several problems with these statements. First of all, EPA will not approve of any decrease in areal extent of the remediation that is currently proposed in the document. Secondly, the new data being collected is not from undisturbed areas, but rather, it is confirmation sampling of the soils that are beneath the excavated surface soil. These samples are taken for the purpose of determining whether remaining soils are below action levels and not for characterization of the extent of contamination. As such, the confirmation sample results must not be used to determine any changed area of contaminated surface for the purpose of this remediation.

If you have any questions in regards to these comments, please call Gary Kleeman at 303 312-6246.

Sincerely,



Mark Aguilar
Rocky Flats Team Leader

Cc Norma Castenada, DOE
Lane Butler, KH
Steve Gunderson, CDPHE